

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED  
WILLIAMSPORT

(1) Koni C. Little 087290  
(Name of Plaintiff) (Inmate Number)

MAR 04 2024  
PER NR  
DEPUTY CLERK

501 Mall Rd, Hbg, PA 17111  
(Address)

(2) \_\_\_\_\_  
(Name of Plaintiff) (Inmate Number)

\_\_\_\_\_  
(Case Number)

\_\_\_\_\_

(Each named party must be numbered,  
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

(1) Lionel Pierre (4) Jill Cuffaro  
(2) Roger Lucas (5) Luis Rodriguez  
(3) Latonya Ray (6) Gregory Briggs  
(Names of Defendants)

(Each named party must be numbered,  
and all names must be printed or typed)

TO BE FILED UNDER:  42 U.S.C. § 1983 - STATE OFFICIALS  
 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

N/A

## II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution?  Yes  No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims?  Yes  No
- C. If your answer to "B" is Yes:

1. What steps did you take? N/A

2. What was the result? N/A

- D. If your answer to "B" is No, explain why not: Never Have I received a response to my Grievances, in order to follow through with my administrative Remedies, and even told "I wouldn't get an answer until they felt like it should be Finalized" by request slip!

## III. DEFENDANTS

(1) Name of first defendant: Lionel Pierre

Employed as Deputy Warden at Dauphin County Prison  
Mailing address: 501 Mail Rd, Harrisburg, PA 17111

(2) Name of second defendant: Roger Lucas  
Employed as Custody Major at Dauphin County Prison  
Mailing address: 501 Mail Rd, Harrisburg, PA 17111

(3) Name of third defendant: Latonya Ray  
Employed as Deputy Warden of Treatment at Dauphin County Prison  
Mailing address: 501 Mail Rd, Harrisburg, PA 17111

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

## IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. In Dauphin County Prison, while (Plaintiff) was held in the RHU, From November 16<sup>th</sup>, 2023 - December 20<sup>th</sup>, 2023, My Constitutional Rights were Violated

( Attached Sheet From Page(2) Section(3)<sup>III</sup> Titled : Defendants )

(4). Name of fourth Defendant : Jill Cuffaro

Employed as: Deputy Warden of Treatment at Dauphin County Prison

Mailing Address: 501 Mall Rd, Harrisburg, PA 17111

(5). Name of Fifth Defendant : Luis Rodriguez

Employed as: Correctional Officer at Dauphin County Prison

Mailing Address: 501 Mall Rd, Harrisburg, PA 17111

(6). Name of Sixth Defendant : Gregory Briggs

Employed as: Warden at Dauphin County Prison

Mailing Address: 501 Mall Rd, Harrisburg, PA 17111

KL  
2/16/24

# "All" of My Legal Mail was Stolen From Me and "All"

of my Property, by Correctional Officers, "Without" Confiscation Slips being given! My Access to the U.S.P.S. was infringed upon, due to the "order" to confiscate "all" Writing Material and Paper/Envelopes. I was Subject to Cruel and Unusual Punishment. I Was Forced to live in Complete Darkness For a Period of 15 days straight I Had to eat, urinate and Defecate in Utter Darkness, which Caused me to consume insects, hair, and other Unknown Substances. My Access to Law Library, Religion Services was infringed upon. No Paper books are allowed in Dauphin County Prison, so all Bibles and Qurans are accessed through the Getting out Tablet System! My Tablet was taken For a Maximum Period of time, from November 16<sup>th</sup>, til this date - 1/29/24, still have not received my Tablet back in my possession. All of the Above Complaints were direct orders given by the Wardens, to the V. RELIEF Correctional officers, when they "Knew" it was illegal to do!

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

see →  
Attached  
Pages  
(1-6)

1. I Want the Warden to be Held Accountable, to the Furthest Extent of the Law. As Well as the Deputy Warden and Custody Major!

2. New Policies implemented to Protect inmates rights.

3. I Want Compensated in Monetary Damages For the Pain + Suffering, Mental Anguish, Physical + Mental Torture I endured, while going through this, at Dauphin County Prison...

(Attached Sheet From Page (2) Section (IV) Titled : Statement of Claim)  
(4)

## Defendant #1 : Lionel Pierre (Deputy Warden)

Lionel Pierre, Confirmed and Assisted With the "Orders" given, along with other Defendants, that Directed Correctional Officers to "shakedown and take everything" Within My Cell. "All" of my Law work / legal Mail was Stolen, "All" Writing Material and Paper / Envelopes causing my access to the Courts as well as the U.S.P.S. to be infringed upon. "All" My Toiletry's, Hygiene, Tablet, Sheets and Extra Clothing was Stolen "Without" Confiscation Slips being given. Lionel Pierre, also confirmed and assisted with the "Orders" To Turn "OFF" all lights in the cells for a Period of 15 days straight! It's the Season of Daylight Savings, so it gets Dark at 4<sup>o</sup>clock or 5, We at Dauphin County Prison eat Dinner after 5, So I was forced to eat, Urinate, and Defecate in Utter Darkness, Which Caused me to consume insects, Hair, and other Unknown substances. Due to my Tablet being Taken, my access to Law Library, Religious Services And Mail was infringed Upon as all these are only allowed through the Tablet System. All of the listed Facts in this here Complaint Stemmed From the Date of November 16<sup>th</sup>, 2023 - December 20<sup>th</sup>, 2023, while I was held in the "Hole" or "RHU" at Dauphin County Prison! Lionel Pierre, Knowingly and Intentionally Violated My Constitutional Rights of "Religious freedom" of the 1<sup>st</sup> Amendment, My Right to be free from Illegal Search And Seizure of the 4<sup>th</sup> Amendment, Cruel and Unusual Punishment of the 8<sup>th</sup> Amendment and 14<sup>th</sup> Amendment, And by Denying my Access to Courts of the 1<sup>st</sup> Amendment, as well as 6<sup>th</sup> Amendment and Lastly 14<sup>th</sup> Amendment. I, Plaintiff Seeks Compensatory & Punitive Judgment Against Defendant for violation of these rights, an excess of 1,000,000 - On December 8<sup>th</sup> 2023, After Complaining and Seeking Answers about what was stolen and the Conditions I was being held in, Lionel Pierre along

With another Named Defendant, Initiated and Assisted with the "SERT" Team of Dauphin County Prison. On this Day, After Complaining about chest Pain and Coming Back From Medical, Demanded to Speak with a Lieutenant, Instead Lionel Pierre (Deputy Warden) as Well as another Named Defendant (custody Major) came with the SERT Team. After about 10 minutes of Complaining and Seeking answers, I was told to face the back Wall and get on my Knees. All while Plaintiff was still Handcuffed with a belt around him, I Complied, going to the wall but Did Not Get on my Knees. An Officer opened the Door and 8-12 Suited Guards Rushed in Full Speed Running, Hitting me first With the Shield, then taken to the Ground where my Head collided with Someones Arm onto the Ground, where I Went Unconscious. I woke up out of my Unconscious state with Guards Knees on my neck, back, and legs. I was then Carried out as I could not Walk. They took me to a Wing Called P3 into a cell, told to Strip Naked! After Being Unconscious, I was too Dazed to Comply when I felt Someone Grab my Arm and told me "Stop Resisting". Then I felt a Punch to the Gut where I Covered myself, Balled up for Protection, I felt Numerous Knees Hit my Head Multiple Times, Pinches to my ribs and stomach. They Twisted my arm turning me onto my Stomach, when I felt Pepper Spray being Smearred onto my Face, eyes, and Mouth. I layed there for a brief Second then tried to lift my Head where a Massive elbow collided to my back Head. I was picked up thrown in the Moveable chair and taken to (Seg), and forced to Strip Naked. Medical Nurse Put Nasaline in my eyes. I told her I Had a headache and my chest and ribs were Sore. Nothing Went Treated, as I Sustained Multiple Swelling (Knots) on my Head, Bruised ribs, and a busted lip. Lionel Pierre Did Nothing to Stop the encounter or Deescalate the Situation As a Result of these Facts and Plaintiffs Injuries, While Defendant Conspired to Violate My 8<sup>th</sup> Amendment, right to be free from Cruel and Unusual Punishment. Due to this Excessive force claim I, Plaintiff Seeks Compensatory & Punitive Judgement of 1,000,000.00 Individually and Professionally. 2/16

'Attached Sheet From Page (2) Section (4) Titled . Statement of Claim)

## Defendant #2 : Roger Lucas (custody Major)

Roger Lucas, Also confirmed and assisted with the "Orders" given, along with other Named Defendants, that Directed Correctional officers to "Shakedown and take everything" Within My Cell. "All" of my Law Work/Legal Mail was Stolen, "All" Writing Material and Paper/Envelopes, Causing my access to the Courts as well as the U.S.P.S to be infringed upon. "All" My Toiletry's, Hygiene, Tablet, sheets and Extra Clothing was Stolen "Without" Confiscation Slips being given. Roger Lucas, also confirmed and assisted With the "Orders" to Turn "OFF" all lights in the Cells for a Period of 15 Days Straight! It's the Season of Daylight Savings, So it gets Dark at 4 or 5<sup>o</sup> clock, We at Dauphin County Prison eat Dinner after 5, So I was forced to eat, Urinate, and Defecate in Utter Darkness, which Caused me to Consume insects, Hair, and other Unknown Substances. Due to my Tablet being Taken, my access to Law Library, Religious Services, And Mail was infringed upon as all these are Only allowed through the Tablet System. All of the listed Facts in this here Complaint Stemmed From the Date of November 16<sup>th</sup>, 2023 - December 20<sup>th</sup>, 2023, while I was held in the "Hole" or "RHU" at Dauphin County Prison. Roger Lucas as our Prison's Custody Major has a Duty to Confine Us as well as Protect Us. Roger Lucas, Knowingly and Intentionally, Violated My Constitutional Rights of "Religious Freedom" of the 1<sup>st</sup> Amendment, My Right to be free From Illegal Search and Seizure of the 4<sup>th</sup> Amendment, Cruel and Unusual Punishment of the 8<sup>th</sup> Amendment and 14<sup>th</sup> Amendment, And by Denying my Access to Courts of the 1<sup>st</sup> Amendment, as Well as 6<sup>th</sup> Amendment, and Lastly the 14<sup>th</sup> Amendment. I, Plaintiff Seek S Compensatory & Punitive Judgement Against Defendant for a Violation of these Rights, and Seek S an exless of 1,000,000.00 U.S. Dollars, in the individual & Professional Capacity. On December 8<sup>th</sup>, 2023, After Complaining and Seeking Answers about what was Stolen and the Conditions I was being held in, Roger Lucas along with another Named Defendant Initiated and Assisted with the "SERT" Team of Dauphin County Prison. On this Day, After

Complaining about Chest Pain and Coming Back from Medical, Demanded to Speak with A Lieutenant, Instead Roger Lucas (Custody Major) as well as another Named Defendant (Deputy Warden) came with SERT Team. After about 10 minutes of Complaining and Seeking Answers, I was told to Face the back Wall and get on my Knees. All while Plaintiff was Still Handcuffed with a belt around him, from Coming back from Medical. I Complied, With going to the Wall, but I Did Not Comply with getting on my Knees. An Officer Opened the Door and 8-12 Suited Guards Rushed in Full Speed Running, Hitting Me First With the Shield, then taken to the ground where my Head Collided with Someone's Arm, Smashing My Head onto the Ground, where I went Unconscious. I woke up out of my Unconscious State With Guards Knees on my Neck, back, and Legs - I was then Carried out as I could Not Walk. They took me to a Wing Called (P3), into a Cell, and told to Strip Naked! After being Unconscious, I was too Dazed to Comply, when I felt Someone Grab My Arm and told me "Stop Resisting", Then I felt a Punch to the Gut where I Covered Myself, Balled up for Protection I felt Numerous Knees hit my Head Multiple Times, and Punches to my ribs and Stomach. They Twisted my arm turning me onto my Stomach, when I felt Pepper Spray being Smearred into my Face, eyes, and Mouth. I layed there for a Brief Second then tryed to lift my Head, when a Massive elbow Collided to the back of my head, Smashing my Head back onto the Ground. After a few minutes, I was Picked up, Thrown in the Moveable chair and taken to (Seg) and forced to Strip Naked. Medical Nurse Put Nasoline in my eyes. I told her I Had a Headache and my chest and ribs were Sore, Nothing Went Treated as I Sustained Multiple Swelling (Knots) on my Head, Bruised ribs, and a busted Lip. Roger Lucas, also Did Nothing to Stop the encounter or Deescalate the Situation. As a Result of these Facts and Plaintiffs Injuries, while Defendant Conspired to Violate My 8th Amendment right, to be free from Cruel and Unusual Punishment. Due to this Excessive Force claim, I, Plaintiff Kani C. Little Seeks Compensatory & Punitive Judgement of 1,000,000.00 U.S. Dollars, In the Individual Capacity & Professional Capacity, as well as Cost of litigation

2/16/24

(Attached Sheet from Page (2) Section (H) Titled: Statement of Claim)

Defendant #3 : Latonya Ray (Deputy Warden of Treatment)

As a Result of My Property being taken Without Confiscation slips, during the "November Shakedown" that other Named Defendants Gave "Orders" to do, I, Plaintiff put in Numerous Grievances to Acquire/Receive my Property. (Law work / Legal Mail, All Writing Material, Paper / Envelopes, Hygiene, Tablet, and my Clothing) in which led to None of those being answered! Finally, It was told to me that my Property was "lost", through word of Mouth by another Staff Member. After about a Month and a half, I decided to again Write Another Grievance, in which stated that "I would like to receive my "Copies" of My Past Grievances to follow through with My administrative Remedies", That Grievance Was Responded to , Detailing my Items that were taken Illegally as that Grievance Response Said " Duplicate Grievance, Items taken during Shakedown". I Wrote a Request Slip asking for "Copies" of My Grievances, that Request Slip Response was " I Wouldnt get anything Until it is at the Final Stage" Further Implicating that my Due Process is being infringed Upon! I am aware of Dauphin County Prison's Grievance System in which Grievances will be responded to in 30 Days With a Copy Detailing if the Complaint has Denied or Accepted. I Havent Received a Response or a Copy til this Date (feb 8). The Grievance Process is ran by Deputy Wardens of Treatment who are, Latonya Ray and Another Named Defendant. As the Staff Members who run the Grievance Process, it is With Deliberate Disregard, that they refuse to Acknowledge my Grievance, Hendering my chance to Follow through with my administrative Remedies, Denying me My Due Process Right as is incorporated in the 5<sup>th</sup> Amendment. I, Plaintiff Seeks Compensatory & Punitive Judgement Against Named Defendant For a Violation of this right, For an excess of 1,000,000.00 U.S. Dollars

in the Individual and Professional Capacity as well as cost of litigation

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2/16/24

Attached Sheet From Page (2) Section (4) Titled: Statement of Claim)

Defendant #4 : Jill Cuffaro (Deputy Warden of Treatment)

As a Result of My Property being taken Without Confiscation slips, during the "November Shakedown", (the Basis of the initial Complaint), that other named Defendants Gave "Orders" to do, I, Kani Little, Plaintiff put in Numerous Grievances to Acquire/Receive my Property.. (Law work/Legal Mail, All Writing Material, Paper/Envelopes, Hygiene, Tablet, and my clothing) in which led to None of those being Answered! Finally, It was told to me by word of Mouth, that my Property was "lost". After About a Month and a Half, I decided to again write another Grievance, in which Stated that "I Would like to receive my "copies" of my Past Grievances to follow through with my administrative Remedies", That Grievance Was Responded to, Detailing my Items that were taken Illegally as that Grievance Response Said "Duplicate Grievance, Items taken during Shakedown". I wrote a Request Slip asking For "Copies" of my Past Grievances, that Request Slip Response was "I wouldnt get anything Until it is at the Final Stage" further Implicating that they are not giving me my copies /Response to my Grievances purposefully and Deliberately, making my Due Process to be infringed upon! I am aware of Dauphin County Prison's Grievance System in which Grievances will be responded to No later than 30 Days, with a COPY Detailing if the Complaint has been Denied or Accepted. I Have Not Received a Response or a Copy til this Date (Feb 8). The Grievance Process is ran by Deputy Wardens of Treatment who are Jill Cuffaro, and Another Named Defendant. As the Staff Members who run the Grievance Process, it is With Deliberate Disregard, that they refuse to Acknowledge my Grievance, Hendering my chance to follow throug with my Administrative Remedies, Denying me My Due Process Right as is incorporated in the 5<sup>th</sup> Amendment. I, Plaintiff SeekS Compensatory

Punitive Judgement Against the above Named Defendant For a  
Violation of this Right, for an excess of 1,000,000.00 U.S. Dollars  
in the Individual and Professional Capacity as well as cost of  
litigation.

KL

2/16/24

(Attached Sheet from Page (2) Section (4) Titled: Statement of Claim)

## Defendant #5: Luis Rodriguez (Correctional Officer)

Luis Rodriguez, was the Lead Correctional Officer that assisted other Correctional Officers to Shakedown / Search my cell and take "everything" Following "Direct Orders" given to him by other Named Defendants.

Luis Rodriguez did in fact take "everything" out of my cell, which includes "All my Law work / Legal Mail, "All" Writing Material and Paper / Envelopes, "All of my Toiletry's, Hygiene, Tablet, Sheets and Extra Clothing! Everything Named was taken from out of my cell "Without" Confiscation Slips being given.

Luis Rodriguez, was in fact the Lead Correctional Officer, that followed "Orders" given to him by other Named Defendants, to Turn "OFF" all lights in the Cells on P6 RTU, in Dauphin County Prison for a Period of 15 days straight! Its the Season of Daylight Savings, So it gets Dark at 4 or 5 o'clock, We at Dauphin County Prison eat Dinner after 5, So I was forced to eat, Urinate, and Defecate in utter Darkness, which caused me to consume insects, Hair, and other Unknown Substances. My Access to the Courts, as well as the U.S.P.S. was infringed upon, Due to "All" Writing Material and Paper / Envelopes being taken from me. My Access to Law Library, Religious Services, and Mail was infringed upon, Due to my Tablet being Taken, as all these are only allowed through the Tablet System.

All of the listed Facts in this here Complaint Statement Stemmed From the Date of November 16<sup>th</sup>, 2023 - December 20<sup>th</sup>, 2023! Luis Rodriguez, acted with Deliberate Disregard and had Full Knowledge and Intention with Violating My Constitutional Rights of "Religious freedom" of the 1<sup>st</sup> Amendment, My Right to be Free from Illegal Search and Seizure of the 4<sup>th</sup> Amendment, Cruel and Unusual Punishment of the 8<sup>th</sup> and 14<sup>th</sup> Amendments, And by Denying my Access to Courts as incorporated in the 1<sup>st</sup>, 6<sup>th</sup>, and 14<sup>th</sup> Amendments. I, Plaintiff Seeks Compensatory and Punitive Judgement Against (Named) Defendant For a Violation of these rights,

for an excess of 1,000,000.00 U.S. Dollars, in the Individual and Professional Capacity as well as Cost of Litigation.

KL

2/16/24

(Attached Sheet From Page (2) Section (4) Titled : Statement of Claim)

Defendant #6: Gregory Briggs (Warden)

Gregory Briggs, gave the Commanding "Orders" that other Named Defendants confirmed and Assisted, that Directed Correctional officers to "Shakedown /Search" my cell and take "everything" Within my Cell. Everything Consisted of "All my Law Work /Legal Mail, "All" Writing Material and Paper /Envelopes, My Toiletry'S, Hygiene , Tablet, Sheets and Extra Clothing Were all taken from me "Without" Confiscation Slips being given! Gregory Briggs, gave the Commanding "Orders" to Turn "OFF" All lights in the Cells on P6 RTU in Dauphin County Prison for a Period of 15 days Straight! Its the Season of Daylight Savings, So it gets Dark at 4 or 5<sup>o</sup> dock. We at Dauphin County Prison eat Dinner after 5, So I was forced to eat, Urinate, and Defecate in utter Darkness, which caused me to consume insects, Hair, and other Unknown Substances. My Access to the Courts as Well as the U.S.P.S. Was infringed upon Due to My Property - "All" Writing Material and Paper /Envelopes being taken and Not Returned ! My Access to Law Library, Religious Services, and Mail was infringed upon, Due to My Tablet being taken, as all these are only allowed through the Tablet System. All of the listed facts in this here Complaint Statement Stemmed From the Date of November 16<sup>th</sup>, 2023 - December 20<sup>th</sup>, 2023 ! Gregory Briggs Acted with FULL Knowledge and Intention, With Deliberate Disregard in Violating My Constitutional Rights of "Religious Freedom" as incorporated in the 1<sup>st</sup> Amendment, My Right to be free From Illegal Search and Seizure as is incorporated in the 4<sup>th</sup> Amendment, Cruel and Unusual Punishment as is incorporated in the 8<sup>th</sup> and 14<sup>th</sup> Amendments, And by Denying my access to Courts as is incorporated in the 1<sup>st</sup>, 6<sup>th</sup>, and 14<sup>th</sup> Amendments. I, Plaintiff Seeks Compensatory and Punitive Judgement Against (Named) Defendant For

A Violation of these rights, and the Mental and Physical torture  
I Had endured, for an excess of 1,000,000.00 U.S. Dollars, in  
the Individual and Professional Capacity as well as cost of litigation

KL 2/16/24

For an amount of 1,000,000.00 U.S. Dollars, for Punitive, and Compensatory Damages, in their Individual, and Professional Capacity, as well as cost of litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16<sup>th</sup> day of February, 2024.

(Signature of Plaintiff)

KL - KANI C. LITTLE



087290

DAUPHIN COUNTY PRISON  
501 MALL ROAD  
HARRISBURG, PA 17111-1299

HARRISBURG PMDC 157

1001 29 MAR 2024 PM

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UNITED STATES DISTRICT COURT  
For the  
MIDDLE DISTRICT OF PENNSYLVANIA

U.S. COURTHOUSE  
240 West Third Street, Suite 218  
Williamsport, PA 17701